

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 20-284 (ECT)

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	<b>DEFENDANT'S MOTION TO</b>
v.	)	<b>EXTEND SELF SURRENDER DATE</b>
	)	
JENNIFER LYNN BOUTTO.	)	
	)	
Defendant.	)	

Ms. Jennifer Lynn Boutto, by and through her attorney, Shannon Elkins, hereby moves this Court for an Order granting Ms. Boutto additional time to self-surrender to serve her 8-month sentence. Currently she is scheduled to self-surrender to the United States Marshal by 10:00 a.m. or the Bureau of Prisons by 12:00 p.m. on Thursday, December 16, 2021 and she is requesting a 42-day extension to self-surrender on January 27, 2022.

As the Court may recall, Ms. Boutto's husband, C.B., was hospitalized due to COVID-19 at the time of Ms. Boutto's sentencing. C.B. was in Unity Hospital from September 27, 2021 until November 10, 2021. During this time, he was placed in the ICU due to severe oxygen issues until he could be released to a recovery room on October 23, 2021. On November 10, 2021, C.B. was released from Unity Hospital and transferred to the Critical Illness Recovery Hospital Division at Regency Hospital in Golden Valley, Minnesota. On November 22, 2021, when C.B.'s oxygen use decreased enough, he was released to his home under Ms. Boutto's care. C.B.'s case manager at Regency Hospital, K.Z., indicates that C.B. would *not* have been released to his home if Ms. Boutto were not

there to watch and care for C.B.

Ms. Boutto is essential in C.B.'s daily care. She is required to monitor his daily health, his oxygen levels and his oxygen equipment. She is also needed in case of any emergencies and to assist him with daily activities.

Many of Minnesota's hospitals are full with Covid-19 patients and many people need to be moved to in-home care, when it's possible. C.B. needed to go home. And now that he is there, he needs Ms. Boutto's assistance.

For these reasons, Ms. Boutto respectfully requests her self-surrender date be extended to January 27, 2022. Two investigative memos regarding interviews with medical staff K.Z. and E.E. and eleven pages of medical records accompany this motion to the Court.

Dated: December 13, 2021

Respectfully submitted,

*s/Shannon Elkins*

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